

DEPARTMENT OF WATER RESOURCES

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June 17, 2014

Ms. Marlene D. Best
City Manager
City of Imperial
420 South Imperial Ave.
Imperial, California 92251

Imperial Regional Water Management Plan Draft Review

Dear Ms. Best:

Attached please find the Department of Water Resources (DWR) draft review of the Imperial Integrated Regional Water Management (IRWM) Plan. Based on our review, the Imperial IRWM Plan is not consistent with the IRWM Planning Act and the related IRWM Plan Standards contained in the 2012 IRWM Grant Program Guidelines because of issues related to the Impact and Benefit, Plan Performance and Monitoring, and Climate Change standards.

DWR encourages you to contact the person below to discuss the draft review and possible follow-up. It is incumbent on the Regional Water Management Group to respond in a timely manner as the Plan Review Process does not exempt the IRWM region from compliance with external deadlines and requirements, such as application due dates or provisions of existing grant agreements.

Pursuant to Appendix H of the Guidelines, the public comment period for this review will begin on June 16, 2014. The draft review will be available for public comments for 30 calendar days on the following website: <http://www.water.ca.gov/irwm/grants/prp.cfm>.

Please contact Ted Daum at (916) 651-9264 or Theodore.Daum@water.ca.gov.

Sincerely,

A handwritten signature in cursive script, reading "Tracie L. Billington".

Tracie L. Billington, P.E. Chief
Financial Assistance Branch
Division of Integrated Regional Water Management

INTRODUCTION

IRWM planning regions must have an IRWM Plan that has been reviewed and deemed consistent with the 2012 IRWM Plan Standards by DWR for eligibility to receiving Round 3 Proposition 84 funding. This 2012 IRWM Plan Standards Review Form for DWR staff use provides a consistent means in determining whether the 2012 IRWM Guidelines are being addressed in the IRWM Plan. It is part of the Plan Review Process that will begin prior to Round 3 solicitation. The form is similar to a grant application review form in that there is a checklist for each of the 16 Plan Standards and narrative evaluations where required. However, the evaluation is pass/fail; there is no numeric scoring. Each Plan Standard is either sufficient or not based on its associated requirements. Each Standard consists of between one and fourteen requirements. A Yes or No is automatically calculated in each Plan Standard header based on the individual requirement evaluations. In general, a passing score of "C" (i.e. 70% of the requirements for a given Plan Standard) is required for a Standard to pass. Standards with only one or 2 requirements will need one or both of those requirements to pass. Standards with 3 requirements will need at least 2 of the requirements to pass. Standards with 4 or 5 requirements will need at least 3 to pass. Some plan elements are legislated requirements. Such plan elements must be met in order to be considered consistent with plan standards. A summary of the sufficiency of each Standard is automatically calculated on the Standards Summary worksheet. A "No" evaluation indicates that a Standard was not met due to insufficient requirements comprising the Standard. The evaluation for each Plan Standard and any associated insufficiencies is automatically compiled on the Standards Summary page. Additional reviewer comments may be added at the bottom of each standards work sheet.

Note: This review form is meant to be a tool used in conjunction with the 2012 IRWM Guidelines document to assist in the evaluation of IRWM plans. It is not designed to be a substitute for the Guidelines document itself. Reviewers must use the Guidelines in determining plan consistency.

DEFINITION OF TABLE HEADINGS

IRWM Plan Standard: As named in the November 2012 IRWM Prop 84 and 1E Guidelines.

Overall Standard Sufficient: This field is either "YES" or "NO" and is automatically calculated based on the "Sufficient" column described below. If all fields are "y", the the overall standard is deemed sufficient. Any entry other than a "y" in the Sufficient column (i.e. "n", "?", not sure, more detail needed, etc.) results in a NO.

Plan Standard Requirements Which Must Be Addressed Fields with an asterisk * are required by legislation to be included in an IRWM Plan.

Requirement	Requirements are taken directly from the November 2012 Guidelines.
Included	Is the Guideline Requirement included in the IRWM Plan? The options are: y = yes, requirement is included in the IRWMP; or n = no, requirement is not included in the IRWMP. If only y or n then presence/absence of the requirement is sufficient for evaluation. If there is a "q" (qualitative) then add a brief narrative, similar to a Grant Application Review public evaluation or supporting information.
Plan Standard Source	
2012 IRWM Grant Program Guidelines Source Page(s)	Page(s) in the Guidelines (November 2012) which pertain to the Requirement.
Legislative Support and/or Other Citations	The CWC or other regulations that pertain to the Requirement, if applicable . This is for reference purposes. The cell links to a weblink of the regulatory code.
Evidence of Sufficiency	
Location of Standard in Grantee IRWM Plan	The page(s) or sections in the IRWM Plan where information on the Requirement can be found. This can be specific paragraphs or entire chapters for more general requirements.
Brief Qualitative Evaluation Narrative	Supporting information for the Requirement if a "q" is in the Included column. This can be just a few sentences or a paragraph and can be taken directly from the IRWM Plan. Comments or supporting information may be entered regardless of whether required.
Sufficient	Is the Guidelines requirement sufficiently represented in the IRWM Plan (y/n).

2012 IRWM Plan Standards Review Form

Regional Acceptance Process Planning Region: Imperial
 Regional Water Management Group: Imperial RWMG
 IRWM Plan Title: Imperial IRWMP

ONE OR MORE PLAN STANDARDS NOT SUFFICIENT

IRWM Plan Standard	Overall Standard Sufficient	Requirement(s) Insufficient
Governance	Yes	
Region Description	Yes	
Objectives	Yes	
Resource Management Strategies	Yes	
Integration *	Yes	
Project Review Process	Yes	
Impact and Benefit	No	See Impact and Benefit Plan Standard
Plan Performance and Monitoring	No	See Plan Performance and Monitoring Plan Standard
Data Management	Yes	
Finance	Yes	
Technical Analysis	Yes	
Relation to Local Water Planning	Yes	
Relation to Local Land Use Planning	Yes	
Stakeholder Involvement	Yes	
Coordination	Yes	
Climate Change	No	See Climate Change Plan Standard

* If not included as an individual section use Governance, Project Review Process, and Data Management Standards per November 2012 Guidelines, p. 44.

Additional Comments:

Although not needed to become consistent with current plan standards, DWR recommends the RWMG consider the following comments in future plan updates: **Governance:** (1) A discussion of how the governance structure ensures long term implementation of the Plan could not be located. (2) Plan does not discuss how interim or formal changes will be performed. (3) Plan does not discuss how the governance structure will update or amend the plan. **Region Description:** Section 4.2 describes many of these issues including Disadvantaged Communities (DACs) located in the area. However it did not address whether there are any Tribes located in the area, or the water challenges facing the DACs. **Objectives:** The Plan states that the objectives are prioritized, but it does not explain how. **Project Review Process:** A discussion of the status of the project proponents IRWM plan adoption could not be located. **Data Management:** (1) Data needs are only described in very general, broad terms. (2) QA/QC measures are only described for current Imperial Irrigation District flow data, there is no other QA/QC description for other types of data. (3) The plan does not explain how the DMS supports the region's efforts to share collected data. **Finance:** (1) No explanation on the certainty and longevity of known or potential funding sources. (2) No explanation on funding for O&M costs and on the certainty and longevity of known or potential O&M funding sources. **Relation to Local Land Use Planning:** Section 11.6.2 lists potential strategies that could address improved coordination in water management planning activities. As stated in the plan these strategies "may prove useful" to future update of the IRWM plan. This linkage should be strengthened. **Stakeholder Involvement:** Section 3.5.4 describes DAC outreach and needs assessment, but there is no mention of tribal communities.

IRWM Plan Standard: Governance					Overall Standard Sufficient		Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Regulatory and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Document a governance structure to ensure updates to the IRWM Plan							
The name of the RWMG responsible for implementation of the IRWMP	y/n	y	18/35	CWC §10539	Appendix A-1		y
A description of the IRWM governance structure	y/n	y	19/36		Sec. 3.2 & Appendix A-1		y
A description of how the chosen form of governance addresses and ensures:							
Public outreach and involvement processes	y/n/q	y	19/36-37	§10540, §10541	Sec. 3.5 & Appendix C	IID provided government affairs staff to coordinate outreach and public relations functions. The consultant team and IID staff developed presentations and briefing materials for use by Water Forum members at regularly scheduled stakeholder business meetings. The Water Forum used a variety of media in its public outreach efforts to publicize the IRWM process and encourage participation, including the development of the IRWMP web page which is used to publish meeting announcements and notes, presentations, briefings, and draft and final technical work products, including the draft and final Imperial IRWMP. Water Forum meetings are recorded (video/audio) and are available to the public via the IRWMP website for those who could not attend. All Water Forum and work group meetings were open to the public. DAC outreach and a needs analysis was performed early in the process.	y
Effective decision making	y/n/q	y	19/37		Sec. 3.4 & Appendix A-1	Appendix A-1 contains the RWMG Charter that is used to guide the IRWM process including decision making. Section 3.4 describes the decision making process which is consensus based, however a simple majority vote is used when necessary.	y
Balanced access and opportunity for participation in the IRWM process	y/n/q	y	19/37		Sec. 3.3.1, 3.3.2, 3.5, & 2.3	Water Forum membership includes broad representation and diversity of perspectives, while providing stakeholder involvement, coordination, and input during development of the IRWMP; thereby representing their group’s interests, providing for two-way communications, building consensus, and making decisions. Membership is open to all public agencies and organized stakeholder groups. The purpose of the RWMG members is to engage elected officials and leaders from stakeholder groups, resolve conflicts, build political support, and achieve a unified front for implementing regional water projects.	y
Effective communication – both internal and external to the IRWM region	y/n/q	y	19/37-38		Sec. 3.5 & 2.5	Section 3.5 describes internal communication and Section 2.5 describes external communication with surrounding IRWM regions.	y
Long term implementation of the IRWM Plan	y/n/q	N	19/38			A discussion of how the governance structure ensures long term implementation of the Plan could not be located.	N
Coordination with neighboring IRWM efforts and State and federal agencies	y/n/q	y	19/38		Sec 2.5 & 3.5.5	Section 2.5 describes interaction with surrounding IRWM regions. Section 3.5.5 describes interactions with State & federal agencies.	y
The collaborative process(es) used to establish plan objectives	y/n/q	y	19/38		Sec 1.6 & 1.7	Section 1.6 describes the outreach process, stakeholder involvement and DAC involvement in identifying regional issues and concerns. This led to the establishment of the goals and objectives summarized in Section 1.7.	y
How interim changes and formal changes to the IRWM Plan will be performed	y/n/q	N	19/38			Plan does not discuss how interim or formal changes will be performed.	N
Updating or amending the IRWM Plan	y/n/q	N	19/38			Plan does not discuss how the governance structure will update or amend the plan.	N
Publish NOI to prepare/update the plan; adopt the plan in a public meeting	y/n/q	Y	35	CWC §10543	Sec. 3.5.9	The plan states that an NOI to adopt the final draft plan was published in the local media.	Y

IRWM Plan Standard: Region Description					Overall Standard Sufficient		Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
If applicable, describe and explain how the plan will help reduce dependence on the Delta supply regionally	y/n	y	20	--			N/A
Describe watersheds and water systems	y/n	y	19/39	PRC §75026.(b)(1) and CWP Update 2009	Sec. 4.3.3.1, 4.3.3.2, 4.1.1, & Figures 4-10, & 4-11,		y
Describe internal boundaries	y/n	y	19/39	--	Sec. 2.1, & Figures 1-1 & 1-2		y
Describe water supplies and demands for minimum 20 year planning horizon	y/n	y	19/39	--	Chapter 5		y
Describe water quality conditions	y/n	n	19/40	--	Sec, 10.2, 10.3, & 4.3.3,3		y
Describe social and cultural makeup, including specific information on DACs and tribal communities in the region and their water challenges.	y/n/q	N	19/40	--		Section 4.2 describes many of these issues including DACs located in the area. However it did not address if there are any Tribes located in the area, and it did not address the water challenges facing the DACs.	N
Describe major water related objectives and conflicts *	y/n/q	y	19/40	§10541. (e)(3)	Sec 1.5, 1.6, & 1.7	Objectives are listed and described in this section. A group of objectives are listed under each prioritized goal. Conflicts are described in section 1.5	y
Explain how IRWM regional boundary was determined and why region is an appropriate area for IRWM planning.	y/n/q	y	19/40	--	Sec. 2.1, & Figures 1-1 & 1-2	Plan discusses how the regional boundary was determined and why the region is appropriate for IRWM planning.	y
Describe neighboring and/or overlapping IRWM efforts	y/n	y	19/40	--	Sec 2.5 & 3.5.5		y
Explain how opportunities are maximized (e.g. people at the table, natural features, infrastructure) for integration of water management activities	y/n	y	38	--	Sec. 2.4		y

* Requirement must be addressed.

IRWM Plan Standard: Objectives					Overall Standard Sufficient		Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Qualitative Narrative	y/n
Through the objectives or other areas of the plan, the 7 items on pg 41 of GL are addressed. *	y/n	y	20/40 - 41	§10540.(c)	Sec 1.7		y
Describe the collaborative process and tools used to establish objectives: - How the objectives were developed - What information was considered (i.e., water management or local land use plans, etc.) - What groups were involved in the process - How the final decision was made and accepted by the IRWM effort	y/n	y	20/41	--	Sec 1.7		y
Identify quantitative or qualitative metrics and measureable objectives: Objectives must be measurable - there must be some metric the IRWM region can use to determine if the objective is being met as the IRWM Plan is implemented. Neither quantitative nor qualitative metrics are considered inherently better. *	y/n/q	y	20/41 - 42	10541.(e)	Sec 1.7.1 & 1.7.2	The plan states that "members worked to make the objectives measureable, so they could be used to track progress during IRWMP implementation. Specific metrics were included where possible in the objective statements."	y
Explain how objectives are prioritized or reason why the objectives are not prioritized	y/n/q	N	20/42-43	--	Sec. 1.7.2	The Plan states that the objectives are prioritized, but it does not explain how they were prioritized.	N
Reference specific overall goals for the region: RWMGs may choose to use goals as an additional layer for organizing and prioritizing objectives, or they may choose to not use the term at all.	y/n	y	43	--	Sec. 1.7		y

* Requirement must be addressed.

IRWM Plan Standard: Resource Management Strategies (RMS)					Overall Standard Sufficient		Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Identify RMS incorporated in the IRWM Plan: Consider all California Water Plan (CWP) RMS criteria (29) listed in Table 3 from the CWP Update 2009 *	y/n	y	20/43	CWP Update 2009 Volume II; 10541(e)(1)	Chapter 6 & further discussed in Chapters 7-11.		y
Consideration of climate change effects on the IRWM region must be factored into RMS	y/n	y	20/43	--	pg 6-11; Ch 7, 8, 9, 10, 11		y
Address which RMS will be implemented in achieving IRWM Plan Objectives	y/n	y	44	--	Table 6-2		y

* Requirement must be addressed.

IRWM Plan Standard: Integration					Overall Standard Sufficient		Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Contains structure and processes for developing and fostering integration ¹ : - Stakeholder/institutional - Resource - Project implementation	y/n/q	y	20/44 - 45	§10540.(g); §10541.(h)(2)	Sec. 2.4		y

1. If not included as an individual section use Governance, Project Review Process, and Data Management Standards per November 2012 Guidelines, p. 44.

IRWM Plan Standard: Project Review Process					Overall Standard Sufficient		Yes	
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient	
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Regulatory and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n	
Process for projects included in IRWM plan must address 3 components: - procedures for submitting projects - procedures for reviewing projects - procedures for communicating lists of selected projects	y/n	y	20/45	§75028.(a)	Sec 12.1.1		y	
Does the project review process in the plan incorporate the following factors:								
How a project contributes to plan objectives	y/n	y	20		Sec 12.1 & Appendix K		y	
How a project is related to Resource Management Strategies identified in the plan.	y/n	y	20		Sec 12.1 & Appendix K		y	
The technical feasibility of a project.	y/n	y	20		Sec 12.1 & Appendix K		y	
A projects specific benefits to a DAC water issue.	y/n	y	20		Sec 12.1 & Appendix K		y	
Environmental Justice considerations.	y/n	y	20		Sec 12.1 & Appendix K		y	
Project costs and financing	y/n	y	20		Sec 12.1 & Appendix K		y	
Address economic feasibility	y/n	y	21		Sec 12.1 & Appendix K		y	
Project status	y/n	y	21		Sec 12.1 & Appendix K		y	
Strategic implementation of plan and project merit	y/n	y	21/48		Sec 12.1 & Appendix K		y	
Project's contribution to climate change adaptation	y/n	y	21		Sec 12.1 & Appendix K		y	
Contribution of project in reducing GHGs compared to project alternatives	y/n	y	21		Sec 12.1 & Appendix K		y	
Status of the Project Proponent's IRWM plan adoption	y/n	N	21			A discussion of the status of the project proponents IRWM plan adoption could not be located.	N	
Project's contribution to reducing dependence on Delta supply (for IRWM regions receiving water from the Delta).	y/n	y	21				N/A	

IRWM Plan Standard: Impact and Benefit						Overall Standard Sufficient		No
Requirement	Included		Plan Standard Source			Evidence of Sufficiency	Sufficient	
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n	
Discuss potential impacts and benefits of plan implementation within IRWM region, between regions, with DAC/EJ concerns and Native American Tribal communities	y/n	N	21	--		The plan does not discuss potential impacts and benefits of plan implementation.	N	
State when a more detailed project-specific impact and benefit analysis will occur (prior to any implementation activity)	y/n	N	49	--		The plan does not discuss when a more detailed project-specific impact and benefit analysis will occur.	N	
Review and update the impacts and benefits section of the plan as part of the normal plan management activities	y/n	N	50	--		Section 13.2 mentions updating and amending the list of projects and programs, but it does not mention updating plan's impacts or benefits.	N	

IRWM Plan Standard: Plan Performance and Monitoring					Overall Standard Sufficient		No
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Contain performance measures and monitoring methods to ensure that IRWM objectives are met *	y/n	y	21/53	PRC §75026.(a)	Table 14.2		y
Contain a methodology that the RWMG will use to oversee and evaluate implementation of projects.	y/n	N	21/53			A description on how the RWMG will oversee and evaluate project implementation could not be located.	N

* Requirement must be addressed.

IRWM Plan Standard: Data Management					Overall Standard Sufficient		Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Regulatory and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Describe data needs within the IRWM region	y/n	N	54	--	Sec 14.3.1	Data needs are only described in very general, broad terms.	N
Describe typical data collection techniques	y/n	y	54	--	Sec 14.3.1		y
Describe stakeholder contributions of data to a data management system	y/n	y	54	--	Sec 14.3.2 & 14.3.3		y
Describe the entity responsible for maintaining data in the data management system	y/n	y	54	--	Sec 14.3.4		y
Describe the QA/QC measures for data	y/n	N	54	--	Sec 14.3.2	QA/QC measures are only described for current IID flow data, there is no other QA/QC description for other types of data.	N
Explain how data collected will be transferred or shared between members of the RWMG and other interested parties throughout the IRWM region, including local, State, and federal agencies *	y/n	y	54	--	Sec 14.3.5, 14.3.6 & Table 14-2		y
Explain how the Data Management System supports the RWMG's efforts to share collected data	y/n	N	54	--		The plan does not explain how the DMS supports the region's efforts to share collected data.	N
Outline how data saved in the data management system will be distributed and remain compatible with State databases including CEDEN, Water Data Library (WDL), CASGEM, California Environmental Information Catalog (CEIC), and the California Environmental Resources Evaluation System (CERES).	y/n	n	54	--	Sec 14.3.2, 14.3.3, & Table 14-2		y

* Requirement must be addressed.

IRWM Plan Standard: Finance					Overall Standard Sufficient		Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Include a programmatic level (i.e. general) plan for implementation and financing of identified projects and programs* including the following:	y/n	y	21	§10541.(e)(8)	Sec. 12.3		y
List known, as well as, possible funding sources, programs, and grant opportunities for the development and ongoing funding of the IRWM Plan.	y/n	y	21		Tables 12-14 thru 12-20		y
List the funding mechanisms, including water enterprise funds, rate structures, and private financing options, for projects that implement the IRWM Plan.	y/n	y	21		Sec. 12.3.1		y
An explanation of the certainty and longevity of known or potential funding for the IRWM Plan and projects that implement the Plan.	y/n	N	21			No explanation on the certainty and longevity of known or potential funding sources.	N
An explanation of how operation and maintenance (O&M) costs for projects that implement the IRWM Plan would be covered and the certainty of operation and maintenance funding.	y/n	N	21			No explanation on funding for O&M costs and on the certainty and longevity of known or potential O&M funding sources.	N

* Requirement must be addressed.

IRWM Plan Standard: Technical Analysis					Overall Standard Sufficient		Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Document the data and technical analyses that were used in the development of the plan *	y/n	y	22	--	Chapter 5 & Appendix D		y

* Requirement must be addressed.

IRWM Plan Standard: Relation to Local Water Planning					Overall Standard Sufficient	Yes	
Requirement	Included		Plan Standard Source		Evidence of Sufficiency	Sufficient	
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Identify a list of local water plans used in the IRWM plan	y/n	y	22	§10540.(b)	Sec. 2.6		y
Discuss how the plan relates to these other planning documents and programs	y/n	y	22		Sec. 2.4		y
Describe the dynamics between the IRWM plan and other planning documents	y/n	y	22		Sec. 2.4		y
Describe how the RWMG will coordinate its water mgmt planning activities	y/n	y	58		Sec. 2.5		y

IRWM Plan Standard: Relation to Local Land Use Planning						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency	Sufficient	
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Document current relationship between local land use planning, regional water issues, and water management objectives	y/n	y	22/59 - 62	--	Sec 11.6.1		y
Document future plans to further a collaborative, proactive relationship between land use planners and water managers	y/n	y	22/59 - 62	--	Sec 11.6.2	Section 11.6.2 lists potential strategies that could address improved coordination in water management planning activities. As stated in the plan these strategies "may prove useful" to future update of the IRWM plan. This linkage should be strengthened.	y

IRWM Plan Standard: Stakeholder Involvement					Overall Standard Sufficient		Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Contain a public process that provides outreach and opportunity to participate in the IRWM plan *	y/n	y	22/63	§10541.(g)	Sec. 3.5		y
Identify process to involve and facilitate stakeholders during development and implementation of plan regardless of ability to pay; include barriers to involvement *	y/n	y	64	§10541.(h) (2)	Sec 3.3.1 & 3.5		y
Discuss involvement of DACs and tribal communities in the IRWM planning effort	y/n	N	23	--	3.5.4, p.111	Section 3.5.4 describes DAC outreach and needs assessment, but there is no mention of tribal communities.	N
Describe decision-making process and roles that stakeholders can occupy	y/n	y	23	--	Sec. 3.2 & 3.3		y
Discuss how stakeholders are necessary to address objectives and RMS	y/n	n	23	--	Sec. 3.5.3		y
Discuss how a collaborative process will engage a balance in interest groups	y/n	y	23	--	1.2, p.61		y

* Requirement must be addressed.

IRWM Plan Standard: Coordination					Overall Standard Sufficient		Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Identify the process to coordinate water management projects and activities of participating local agencies and stakeholders to avoid conflicts and take advantage of efficiencies *	y/n	y	23/65	§10541.(e)(13)	Sec. 1.2		y
Identify neighboring IRWM efforts and ways to cooperate or coordinate, and a discussion of any ongoing water management conflicts with adjacent IRWM efforts	y/n	y	23/65	--	Sec. 2.5		y
Identify areas where a state agency or other agencies may be able to assist in communication or cooperation, or implementation of IRWM Plan components, processes, and projects, or where State or federal regulatory decisions are required before implementing the projects.	y/n	y	23	--	Sec. 3.5.5		y

* Requirement must be addressed.

IRWM Plan Standard: Climate Change					Overall Standard Sufficient		No
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Evaluate IRWM region's vulnerabilities to climate change and potential adaptation responses based on vulnerabilities assessment in the DWR Climate Change Handbook for Regional Water Planning *	y/n	N	23/66 - 73	Climate Change Handbook vulnerability assessment: http://www.water.ca.gov/climatechange/CCHandbook.cfm ; November 2012 Guidelines Legislative and Policy Context, p. 66 §10541.(e)(11)		The plan only describes the vulnerabilities and adaptation responses to Water Supply but does not evaluate any other areas, such as water quality, ecosystem and habitat impacts, and increased flood risk. In addition, Page O-7 states that "The more detailed evaluation for the vulnerabilities and impacts for the Imperial Region and Colorado River are presented in subsequent sections", but there isn't any additional information.	N
Provide a process that considers GHG emissions when choosing between project alternatives *	y/n	y	23/68		Sec 5.6, Appendices K & O		y
Include a list of prioritized vulnerabilities based on the vulnerability assessment and the IRWM’s decision making process.	y/n	N	23/66 - 73			As noted above, only vulnerability for water supply was evaluated.	N
Contain a plan, program, or methodology for further data gathering and analysis of prioritized vulnerabilities	y/n	N	23/66 - 73			The plan does not contain a program or methodology for further data gathering and analysis for prioritized vulnerabilities.	N
Include climate change as part of the project review process	y/n	y	23/68		Table 12-1, 12-2; Appendix K		y

* Requirement must be addressed.

Regulatory Citation	Link	Notes
IRWM Prop 84 and 1E Guidelines	http://www.water.ca.gov/irwm/grants/docs/Guidelines/GL_2012_FINAL.pdf	DWR November 2012 Guidelines - Final
CWC §10539	http://www.leginfo.ca.gov/cgi-bin/displaycode?section=wat&group=10001-11000&file=10532-10539	
CWC §10540, §10541	http://www.leginfo.ca.gov/cgi-bin/displaycode?section=wat&group=10001-11000&file=10540-10543	
CWC §10543	http://www.leginfo.ca.gov/cgi-bin/displaycode?section=wat&group=10001-11000&file=10540-10543	
PRC §75026, §75028, CWP Update 2009, and California Watershed Portal	http://www.leginfo.ca.gov/cgi-bin/displaycode?section=prc&group=75001-76000&file=75020-75029.5	The Department of Water Resources shall give preference to proposals that satisfy the criteria specified in PRC §75026.(b)(1). §75028.(a) - the department shall defer to approved local project selection, and review projects only for consistency with the purposes of Section 75026.
	http://www.waterplan.water.ca.gov/cwpu2009/index.cfm	2009 California Water Plan Volumes I and II
	http://www.conservation.ca.gov/dlrp/watershedportal/Pages/Index.aspx	California Watershed Portal
§10541. (e)(3)	http://www.leginfo.ca.gov/cgi-bin/displaycode?section=wat&group=10001-11000&file=10540-10543	